

Date: February 27, 2026

From: Will Harris, Professional Geologist

To: The California State Park and Recreation Commission
For: Commission meeting on March 5, 2026

Regarding: The Nine Year Gap of Permanent District Superintendent Representation at Oceano Dunes and Associated Legal Implications

Dear Commissioners,

I am addressing this Commission because of broad implications that extend to all State Parks operations.

I attended the February 26, 2026 meeting of the Off-Highway Motor Vehicle Recreation (OHMVR) Commission in Santa Clarita, California. Prior to that meeting, Deputy Director Sarah Miggins, who leads the OHMVR Division of State Parks, had [this letter](#) to the OHMVR Commission posted to the OHMVR Commission's website.

Miggins prepared her letter, entitled "Correspondence regarding Oceano Dunes SVRA acting Superintendent," in response to my public examination of the legality of the nine year District Superintendent vacancy at the Oceano Dunes District.

That examination, now updated, consists of a compilation of video clips from OHMVR Commission meetings. Forgive me, as the compilation is 15 minutes in length, but it is extensive, with commentary to provide context. It can be found at this link:

<https://youtu.be/W3hCNAMpVnA?si=ARPNMtLL1WR-TA19>

As to Miggins's letter, it is indeed about the District Superintendent vacancy at the Oceano Dunes District, but it fails to address the central legal question I raised in my analysis of the public record. That is: How is State Parks's nine-year use of "acting" appointments consistent with the merit-based civil service system established by Article VII of the California Constitution and Government Code sections 18500 et seq. These mandates require filling civil service positions via competitive examination, and they specifically limit temporary appointments to nine months, not nine years.

The Deputy Director's letter does indicate that the position is uniquely complex, and so implies that a nine-year search for an appropriate candidate is justified. But, to put it kindly, that is not a credible defense. It is an acknowledgment of administrative failure by State Parks.

She then describes the professional development gained by the current acting District Superintendent over the last 14 months. But that only serves to prove that prolonged "acting" appointments create an inherently unfair incumbency advantage. When the position remains in acting status for nine years, the assignment itself becomes the primary means by which a preferred candidate acquires the executive-level experience evaluated during selection. This practice places all other qualified

candidates at a structural disadvantage and fundamentally undermines the requirement for fair and open competition under the law.

State Parks Director Armando Quintero validated these concerns when he announced at the February 26, 2026 OHMVR Commission meeting that the acting incumbent, Jon O'Brien, was selected as the permanent District Superintendent.

The reliance on acting incumbents selected and retained by gubernatorial appointees, such as Deputy Director Miggins and Chief Deputy Director Liz McGuirk, risks converting a constitutionally protected civil service position into a de facto political appointment. Where permanent selection follows months and years of acting service under direct State Parks executive supervision, the practical effect appears to be that the successful candidate is determined in substance before the competitive hiring process even begins. This top-down control ensures that when an acting District Superintendent is chosen as permanent District Superintendent, that person remains an extension of the Executive Office's political will rather than as an independent, duty-bound public servant.

For these reasons, I respectfully offer that this Commission, upon its review of the information I have provided, will view the Deputy Director's letter not as justification for the nine-year vacancy, but as an admission that the State Parks executive team has circumvented California merit system law for nearly a decade. I also hope you address the matter with the State Parks executives attending your March 5, 2026 meeting.

Sincerely,

A handwritten signature in black ink, appearing to read 'Will Harris', written in a cursive style.

Will Harris